

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS

\_\_\_\_\_  
In re

NASSIM S. AOUDE

Debtor  
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Chapter 7, No. 19-40474-CJP

**MOTION TO EXTEND DEADLINE TO**  
**OBJECT TO DEBTOR'S EXEMPTIONS AND DISCHARGE**

Now comes JONATHAN R. GOLDSMITH, the duly appointed, qualified and acting Trustee in the above-captioned case ("Trustee"), and he does hereby request an extension of the deadline to file objections to the Debtor's claims of Exemption and Discharge. In support of this Motion, the Trustee respectfully represents that:

1. On March 26, 2019, the above-named Debtor filed a Voluntary Petition under the provisions of Chapter 7 of the Bankruptcy Code.

2. On March 27, 2019, JONATHAN R. GOLDSMITH accepted the appointment as Chapter 7 Trustee for the above-entitled estate.

3. The Section 341 Meeting of Creditors in this case was originally scheduled for May 1, 2019. Pursuant to a request from Debtor's counsel the 341 Meeting was rescheduled and convened on May 15, 2019.

4. The Trustee states that additional time is needed so that he can continue his investigation into the Debtor's assets and exemptions.

5. As a result, the Trustee hereby requests an extension of the deadline for filing objections to the Debtor's claims of Exemption and Discharge until January 17, 2020.

WHEREFORE, the Trustee respectfully requests that the date for the Trustee to object to the Debtor's claims of Exemption and Discharge be extended to January 17, 2020, and for other and further relief as the Court deems just and proper.

JONATHAN R. GOLDSMITH, TRUSTEE IN  
BANKRUPTCY FOR NASSIM S. AOUDE

Dated: 11/8/19

By: /s/ Jonathan R. Goldsmith, Esq.  
JONATHAN R. GOLDSMITH, ESQ.  
(BBO No. 548285)  
GOLDSMITH, KATZ & ARGENIO, P.C.  
1350 Main Street, Suite 1505  
Springfield, MA 01103  
Tel. (413) 747-0700

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NASSIM S. AOUE	)	
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_____	)	

CERTIFICATE OF SERVICE

I, JONATHAN R. GOLDSMITH, ESQ., of GOLDSMITH, KATZ & ARGENIO, P.C., 1350 Main Street, Suite 1505, Springfield, Massachusetts, do hereby certify that I have served a copy of the within Motion to Extend Time to Object to Debtor's Exemptions and Discharge upon those parties listed below by electronic mail or by mailing, first class mail, postage prepaid, on this 8<sup>th</sup> day of November, 2018:

OFFICE OF THE U.S. TRUSTEE  
446 Main Street, 14<sup>th</sup> Floor  
Worcester, MA 01608

NASSIM S. AOUE  
17 Bluegrass Lane  
Shrewsbury, MA 01545

David M. Nickless, Esq.  
Nickless, Phillips and O'Connor  
625 Main Street  
Fitchburg, MA 01420

/s/ Jonathan R. Goldsmith, Esq.  
JONATHAN R. GOLDSMITH, ESQ.